

Agenda
Permitting and Corrective Action Meeting
Former Total Petroleum Refinery
EPA ID# KSD087418695

Participants: MRP Properties Company, LLC.
MWH Americas, Inc.
Kansas Department of Health and Environment
United States Environmental Protection Agency

Location: Tallgrass Conference Room 3E
3rd Floor Curtis State Office Building
1000 SW Jackson Street, Topeka, KS

Date: May 8, 2012

Time: 8:00 A.M. to 2:00 P.M.

1. **Overview of Site** – Brief overview by MRP
2. **Status of Permit Renewal**
3. **Closed Surface Impoundment AS/SVE** – KDHE is acceptable to MRP's request to discontinue operation based on evaluation of data indicating that the system has reached the end of its effectiveness. The parties will briefly discuss plugging and abandoning of Air Sparge and Soil Vapor Extraction wells.
4. **Land Treatment Unit AS/SVE** – KDHE is acceptable to MRP's request to discontinue operation based on evaluation of data indicating that the system has reached the end of its effectiveness. The parties will briefly discuss plugging and abandoning of Air Sparge and Soil Vapor Extraction wells.
5. **Closure Plan for Land Treatment Unit (LTU)** – No action to be taken at this time. Will delay closure until soil investigation completed.

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6. **Corrective Action Recovery Well RW-80A** – Discuss MRP's request to remove Recovery Well RW-80A from the Corrective Action Containment and Recovery System (CACRS). Their contention is that operation of RW-80A is interfering with the ability of Recovery Well RW-75 to maintain an adequate reverse gradient of the aquifer. MRP is also requesting to remove the pumping equipment and disconnect the well from the CACRS. RW-80A is located on the river side of the Walnut River Levee and MRP is concerned about damage and resulting contamination if this well is damaged during flooding.
7. **Evaluation of Supplemental Soil Investigation (SSI)** - EPA has indicated in their comments on the SSI report that risk cannot be adequately assessed without including all site constituents in risk calculations. Only six (6) PAH's, which were calculated as COPC's in the 2005 Cleanup Goals Report, were analyzed during the SSI investigation. The following issues will be discussed:
 - a. Re-sampling of a select number of borings to obtain a representative number of samples to adequately address risk at the units. (Proposed Sampling Protocol is attached)
 - b. Background sampling of Arsenic. Submission by MRP of alternate locations.
 - c. Re-sampling to address Hexavalent Chromium risk. Submission by MRP of re-sampling locations.
 - d. A Probabilistic Risk Assessment (PRA) will not be considered at this time. A PRA requires a baseline risk assessment. MRP has indicated that the SSI report only included risk screening.
8. **Tank Farm and LTU Soil Investigation** – Discuss soil sampling plans for investigating the Tank Farm Area and LTU. Previous sampling during the RFI Phase II was inadequate. The parties will discuss whether to divide Tank Farm Area into exposure units, agree on the number, depth, and location of borings; and identify the constituents to be analyzed. KDHE will present a proposed sampling plan for the LTU.
9. **Comprehensive Groundwater Monitoring Program** – It is KDHE's intention to include a comprehensive monitoring program for the entire facility in the new Permit. All groundwater monitoring would be addressed into a single Sampling and Analysis Plan (SAP). MRP has submitted a

proposal for well locations for the areas outside the Waste Management Area (WMA). KDHE will provide a modified proposal at the meeting that will focus on monitoring the dissolved phase plume and verifying that the plume has not migrated beyond the property boundaries.

Additional Groundwater Investigations – Develop plans for a groundwater investigation south of Recovery Well RW-75 to define groundwater movement and adequacy of the corrective action containment system in that area. Addition – Determine cause of groundwater mounding at Well #24 and to a lesser extent Well ET-03.

10. Conclusion and Follow Up